



INSTITUTE FOR JUSTICE

January 18, 2021

VIA ECF/CM

Hon. Judge Margo K. Brodie
United States District Court, Eastern District of New York
225 Cadman Plaza East, Courtroom 6F
Brooklyn, New York 11201

RE: *Joseph Corsini v. City of New York*, 1:20-cv-5459 (MKB)(LB)

Dear Judge Brodie:

We represent Plaintiff Joseph Corsini (“Mr. Corsini”) in the above-captioned matter. Pursuant to Rule 3A of this Court’s Individual Practices and Rules and this Court’s Order dated January 11, 2021, Mr. Corsini submits this letter in response to the request for a pre-motion conference submitted by Defendant City of New York (“the City”) on January 11, 2021, ECF No. 14.

Mr. Corsini does not oppose the City’s filing of a motion to dismiss. Mr. Corsini will, however, oppose the substance of the City’s forthcoming motion and will file a response opposing the motion. Given this, counsel for the parties have conferred, and they do not believe that the City’s requested pre-motion conference is necessary. The parties therefore request that this Court set a briefing schedule for the City’s motion. The parties respectfully propose the following briefing schedule:

1. The City’s motion and memorandum of law in support would be served thirty (30) days from the date of this Court’s order setting a briefing schedule.
2. Mr. Corsini’s response to the City’s motion would be due thirty (30) days from the date the City serves its motion and memorandum.
3. The City’s reply in support of its motion, and the filing of each of the parties’ motion papers, would be due fourteen (14) days after the date Mr. Corsini serves his response.

Please note that while Mr. Corsini does not oppose the City’s filing of a motion to dismiss, he reserves the right to object to any defects, procedural or otherwise, in the City’s motion papers.

Hon. Judge Margo K. Brodie
January 18, 2021
Page 2

Dated this 18th day of January, 2021.

Respectfully submitted:

s/ William R. Maurer
William R. Maurer
INSTITUTE FOR JUSTICE
600 University Street, Suite 1730
Seattle, Washington 98101
Tel: (206) 957-1300
Email: wmaurer@ij.org

Attorney for Plaintiff Joseph Corsini

cc: Darren Trotter (via ECF/CM)